

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

THE TEXAS GENERAL LAND
OFFICE; and DAWN BUCKINGHAM,
M.D., in her official capacity as
Commissioner of the Texas General
Land Office,

Plaintiffs,

V.

JOSEPH R. BIDEN, in his official capacity as President of the United States of America; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; and ALEJANDRO MAYORKAS, in his official capacity as Secretary of the United States Department of Homeland Security,

Defendants.

THE STATE OF MISSOURI; and THE
STATE OF TEXAS.

Plaintiffs,

V.

JOSEPH R. BIDEN, in his official capacity as President of the United States of America; THE UNITED STATES OF AMERICA; ALEJANDRO MAYORKAS, in his official capacity as Secretary of the United States Department of Homeland Security; UNITED STATES DEPARTMENT OF HOMELAND SECURITY; TROY A. MILLER, in his official capacity as the Acting Commissioner of United States Customs and Border Protection; and UNITED STATES CUSTOMS AND BORDER PROTECTION.

Defendants

UNOPPOSED MOTION FOR SUBSTITUTION OF COUNSEL

Plaintiffs' counsel, Cory R. Liu, has departed the Ashcroft Law Firm to pursue another professional opportunity, necessitating his withdrawal from this matter. Plaintiffs have reached an agreement to retain as substitute counsel Austin R. Nimocks and Christopher L. Peele, who both entered their appearances in this matter on March 13, 2023 (Dkts. 76 & 77). Plaintiffs therefore ask the Court to grant this motion for substitution of counsel and authorize the withdrawal of Cory R. Liu and the Ashcroft Law Firm as counsel. Granting this motion will cause no prejudice or delay in this matter, and the government is unopposed.

RESPECTFULLY SUBMITTED this the 14th day of March, 2023,

/s/ Cory R. Liu
Cory R. Liu
Texas Bar No. 24098003
S.D. Tex. Bar No. 3047640
ASHCROFT LAW FIRM LLC
919 Congress Ave., Ste. 1325
Austin, TX 78701
Phone: (512) 370-1800
Facsimile: (512) 727-8200
Email: cliu@ashcroftlawfirm.com

/s/ Austin R. Nimocks
Austin R. Nimocks
Texas Bar No. 24002695
S.D. Tex. Bar No. 2972032
PEELE | NIMOCKS LAW FIRM
4002 E. Hwy. 290
Dripping Springs, TX 78620
Phone: (512) 522-4893
Email: austin@peelenimocks.com

*Counsel for Plaintiffs Texas General Land
Office and Commissioner Dawn
Buckingham, M.D.*

CERTIFICATE OF CONFERENCE

I hereby certify that on February 28, 2023, I conferred with counsel for Defendants and Defendants are not opposed.

/s/ Cory R. Liu
Cory R. Liu

CERTIFICATE OF SERVICE

In accordance with Fed. R. Civ. P. 5(b)(2)(E) and Local Rule 5.3, I hereby certify that on March 14, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification of such filing to all counsel of record.

/s/ Austin R. Nimocks
Austin R. Nimocks